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June 19, 2007

Administrator
U.S. Environmental Protection Agency
Ben Franklin Post Office
P.O. Box 862
Washington, DC 20044
Attention: Chemical Right-to-Know Program
HPV Challenge Program

Subject: Request to transfer Irgafos 168 (CAS 31570-04-4) from the EPA HPV Program
to OECD [HPV Company Registration Number]

Dear HPV Coordinator:

Ciba Specialty Chemicals Corporation supports EPA's HPV program and has made a public commitment to sponsor a number of chemicals under the program. In May 2000, Ciba Specialty Chemicals submitted a test plan and robust summaries for Irgafos 168 (Phenol, 2,4-bis(1,1-dimethylethyl)-phosphate (3:1)). The test plan and robust summaries for Irgafos 168 were reviewed by the agency and are available on EPA's HPV web site.

We are currently also in the process of supporting Irgafos 168 in the International OECD SIDS program. Irgafos 168 was discussed at the SIAM 18 in April 2004 (SIAM 18, Paris). The enclosed document is a summary of the conclusions on Irgafos 168 at SIAM 18. This and other information on the status of the chemical are available on the OECD website (<http://cs3-hq.oecd.org/scripts/hpv/>).

We believe that to maintain accuracy and consistency, the robust summaries and related information should be maintained in just one HPV system. Therefore, Ciba Specialty Chemicals would like to request that Irgafos 168 be removed from EPA's HPV program and supported only through the OECD SIDS program.

Please let me know if you have any comments or need additional information.

Sincerely yours,

Richard Balcomb
Head, Toxicology and Environmental Assessments

Enclosure